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Attorneys for Plaintiff
NEO4J, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NEO4J, INC., a Delaware corporation,
Plaintiff,

v.

GRAPH FOUNDATION, INC., an Ohio
corporation,
Defendant.

CASE NO. 5:19-cv-06226-EJD

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION TO COMPEL
FURTHER RESPONSES AND
PRODUCTION TO INTERROGATORY,
SET 1**

Action Filed: October 1, 2019
Trial Date: None

Now before the Court is the Parties' Joint Statement Regarding Discovery Deficiencies in Responses to Plaintiff's Interrogatory, Set 1 ("Joint Statement"). Having considered the Joint Statement, the materials filed in support thereof, oral arguments, and good cause appearing therefor:

IT IS HEREBY ORDERED that:

Defendant Graph Foundation, Inc. ("GFI") shall

1. Neo4j's Motion to Compel to provide further responses to interrogatories is granted.

1 GFI shall amend its responses to ROGs 2, 5, 6, 7, 8, 9, 10, 13, 16, 17, 18, and 20 to
2 provide full, unequivocal, and complete responses from all sources within its control.
3 To the extent GFI does not possess any additional responsive information, it must
4 state, via declarations from the Nussbaums, that they have conducted a diligent
5 search and reasonable inquiry, including the sources and custodians they sought
6 information from.

7 **SO ORDERED.**

8
9 Dated: _____, 2020

Judge Susan van Keulen
U.S. Magistrate Judge